

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

^{DR}
Regina Jordan-Sodig
Plaintiff(s),

Case Number 3:25-CV-00288

v.

Judge Judge Eli Richardson

Social Security et. al., and
Defendant(s).

Magistrate Judge Jury Demand

Houston County Community Hospital

Defendant

Response to Defendant Houston County Hospital
(Type of Pleading)
Motion to Dismiss

① Exhibit A: Standard of Operating Procedures
for laboratory work shift Plaintiff was preparing
example pages 1-

② Exhibit B: Copy of My/Plaintiff Medical
Technologist License Tennessee and American
Medical Technologist Certification both
current and in good Standing

①

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the (pleading)
has been served on:

Response to Motion to
Dismiss

(Name)

IN. Scott & Sims

(Address)

3102 West End Avenue, Suite 1100

(Address)

Washville TN 37203

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

(Name)

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(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

on the 4th day of May

2025

Dr. J. J. Sims

Signature

(3)

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE**

Dr. Regina Jordan-Sodiq,
Plaintiff

v.

Social Security et.al., Defendant)
Houston County Community Hospital)
Defendant.)

Case No.: 3:25-CV-00288
Judge Eli Richardson Jury Demand

**PLAINTIFF'S RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION TO
DISMISS AND MOTION TO COMPEL DISCLOSURE OF HEARING DATE AND
REGISTERED AGENT INFORMATION**

I. INTRODUCTION

COMES NOW Plaintiff, **Dr. Regina Jordan-Sodiq**, respectfully opposing Defendants' **Motion to Dismiss**, and further moves this **Honorable Court** to compel Defendant **Houston County Community Hospital (HCCH)** to:

1. **Disclose the scheduled hearing date and location** for Defendant's pending **Motion to Dismiss**.
2. **Provide the correct registered agent name and full address** for proper service of process.
3. **Deny Defendants' Motion to Dismiss with prejudice**, as the Plaintiff has provided substantial factual allegations and legal claims warranting litigation.

II. FACTUAL BACKGROUND

Plaintiff was employed by Defendant **Houston County Community Hospital** as a licensed **Medical Technologist**, holding **advanced certification and responsibilities exceeding those of her Caucasian coworkers, who were Medical Technicians**. Plaintiff was entrusted with **preparing for independent 12-hour night shifts**, demonstrating her commitment to professional excellence.

Despite Plaintiff's **dedication, qualifications, and demonstrated competence**, she was subjected to **discriminatory treatment**, including **disparaging remarks questioning her credentials and competence**, motivated by **bias based on race, age, and rank**. These **prejudicial remarks** were compounded by an **unjust termination**, based on **unverified accusations from biased coworkers**, rather than an **impartial performance assessment**.

4. **Retaliation and Unlawful Bias**

- Defendants failed to uphold procedural fairness, acting upon prejudicial accusations from biased coworkers to justify Plaintiff's wrongful termination.

VI. EVIDENCE OF COMPETENCE

Plaintiff's SOP binder serves as concrete evidence of her preparedness, diligence, and professional initiative. The binder directly refutes Defendants' allegations of incompetence and demonstrates her commitment to excellence in her role.

Additionally, Plaintiff submits her Letter of Certification, confirming her status as a licensed Medical Technologist, further establishing her qualifications and ability to perform her duties competently.

VII. RELIEF REQUESTED

WHEREFORE, Plaintiff respectfully requests that this Court:

- **Compel Defendants to disclose the hearing date, time, and location** for their pending Motion to Dismiss.
- **Require Defendants to confirm the registered agent's full name and official address**, ensuring proper legal service.
- **Deny Defendants' Motion to Dismiss with prejudice**, as Plaintiff has presented **substantial factual allegations and legal claims warranting litigation**.
- **Grant leave to amend the Complaint as necessary**, should corrections or further clarifications be required to ensure procedural integrity.
- **Grant any further relief deemed just and equitable** to prevent procedural obstruction and ensure due process.

CERTIFICATE OF SERVICE

I hereby certify that on this **4th day of May, 2025**, a true and correct copy of **Plaintiff's Response in Opposition to Defendants' Motion to Dismiss and Motion to Compel Disclosure of Hearing Date and Registered Agent Information**, along with accompanying exhibits, was served via **electronic filing** upon the following:

Defendants' Counsel: Michael J. Banks C/O Christopher B. Fowler email: cfowler@kaygriffin.com. Kay Griffin PLLC.

Pursuant to the Tennessee Rules of Civil Procedure, electronic service of this filing is deemed proper and effective.

Submitted this 4th day of May, 2025

Dr. Regina Jordan-Sodiq, Pro Se Plaintiff
1757 Autumnwood Blvd Clarksville, TN 37042

C 1.1.1 A 1

Plaintiff proactively created a **Standard Operating Procedures (SOP) binder**, evidencing professional diligence and commitment to her role. However, shortly after her probationary period, Defendants wrongfully terminated Plaintiff, failing to provide a legitimate, nondiscriminatory basis for their decision.

III. DEFENDANTS' FAILURE TO DISCLOSE HEARING DATE IMPEDES DUE PROCESS

1. Defendants filed a Motion to Dismiss, yet failed to disclose the scheduled hearing date, time, and location, obstructing Plaintiff's ability to prepare an adequate response.
2. Plaintiff has made multiple attempts to obtain this critical procedural information, but Defendants have refused to provide clarity, impeding procedural fairness.
3. The absence of a disclosed hearing date places Plaintiff at an unjust disadvantage, requiring judicial intervention to compel compliance.
4. Additionally, Defendant **Karen Diane Hargrove**, acting as **Laboratory Supervisor**, played a role in Plaintiff's employment-related claims and should be **recognized in this litigation**.

IV. DEFENDANTS' FAILURE TO DISCLOSE REGISTERED AGENT INFORMATION

5. Defendant Houston County Community Hospital has failed to confirm its correct legal entity name and registered agent, obstructing Plaintiff's ability to serve process in compliance with Tennessee law.
6. Defendant's failure to provide accurate service information necessitates judicial intervention to prevent further procedural obstruction.

V. LEGAL CLAIMS

1. **Violation of the Tennessee Human Rights Act (THRA) (Tenn. Code Ann. § 4-21-101 et seq.)**
 - Plaintiff was subjected to discrimination based on race, age, and rank, in violation of the **THRA**.
 - Disparate treatment compared to her Caucasian coworkers, coupled with hostile remarks and wrongful termination, establishes a prima facie case of discrimination.
2. **Violation of Title VII of the Civil Rights Act of 1964 (42 U.S.C. § 2000e et seq.)**
 - Plaintiff's termination was **motivated by racial bias and retaliation**, violating federal employment protections.
 - Defendants' reliance on **unsubstantiated claims and failure to conduct an impartial review** constitutes unlawful discrimination.
3. **Hostile Work Environment**
 - Plaintiff was subjected to **covert workplace harassment**, including **demeaning comments** about her qualifications and professionalism.
 - The persistent pattern of discriminatory remarks created an intimidating, oppressive work environment, violating state and federal law.

Exhibit A 1

HEMATOLOGY @ 4am

--START UP -----make sure get
Hematology start -up Binder in cabinet
F2, Esc
Diluter Function-----SECONDARY MODE ONLY
Start-up, 2X
Esc
Controls
Enter, 'control run'
F2-'Latron QC' (white bottles)—use the bottle
w/ the blk top for the lot# info-(bottle #2)
F3, enter
F4, Primer (white top)
Esc
F3, control , F3 (Secondary /blk top)
F4, print—should have 3-4 pages when
finished

**Run Hematology controls in PRIMARY ONLY
Abn I, Normal QC

QC Coulter Latrons in bottom cabinet
*IF retic is out of range it is ok, only concerned
with DIFF MODE

COAG

--get Coag Green Binder
--go by maintenance instructions

TEMPERATURE:
Sysmex
Temps, compare w/ book

RINSE PROBE:
Special menu
Rinse probe
Setup

*PTT and CaC1 are stable for 2 days, the
others are 1 day stable
* INNOVIN only dilution that is made up

HMX MAINTENANCE BINDER

--put in papers
Daily Latron Tab
Daily Start up Tab

COAG REAGENTS

PTT/ACTIN/ green top bottle --2 days stable
PT/INNOVIN/orange top bottle—1 day stable
CA Clean I & II --1 day stable
CACL --2 day stable

*make new labels for cleaning agents
**COAG maintenance binder is in cabinet w/
Clinitek maintenance binder

Ex: LABELS: INNOVIN
O: 9-16-17
E: 9-17-17 0430

Chemistry

CHANGE LIGHT SENSOR:
Home screen
F4, sys prep
F3, IMT
F1, change consumables (Std A, Std B, Flush,
Salt Soln, Diluent, Sensor)
F4, Diluent Check
--Dilution soln is in the fridge
--also use serum to check the sensor
--? blue

COAG

POSTING QC
After completing Coag QC, input
QC 1
QC 2, "not 3 as it is on the bottle"
-go to red "auto" button on pending list and
click on COAG "CA-600" and then input results
and put "P" for 'Post'.

**Don't forget to sign QC log Book on top of
machine

DATA ENTRY INTO COMPUTER

ABN 1, Normal QC

Hematology start up Binder in cabinet

QC Coulter Latrons , are in bottom cabinet beneath hematology rocker

esc

controls

enter, control run

F2, LATRON , use the bottle with the blk top for LOT# infor (Bottle #2)

F3, enter

F4, primer, white top do first control

F4 , print

esc, F3, control @ (secondary blk top) F3

F4, print, should have 4 papers when finished

*.if retic is out of range it is ok, diff mode is ok,

Exhibit A-2

Exhibit A3

Change Hematology slide box/ file slides in cabinet & pull out and dump slides from previous week

****Hematology Path Reviews** are to be copied and one copy placed in Pathologist book for review

Run Start-up on HMX, F2 "Dilution", enter

Perform Daily Maintenance per Binder-Latron Primer, Latron QC—Run in **SECONDARY MODE**

File HMX Start up and Latron printouts in HMX Maintenance Binder— 3--4 pages

0400-0500

Run Hematology QC (Normal & Abnormal I)—**primary side only**

COAG—Refresh Coag reagents as needed and perform daily maintenance listed in Coag Binder

SUNDAY ONLY--clean COAG w/ Reagent Alcohol (located in yellow cabinet in blood bank) , then refill DI water

SUNDAY night AND MONDAY morning—Run Coag QC, once reconstituted only good for 16 hours, and must be ran every 8 hours

0500

Make sure you've signed off all daily maintenance binders/clipboards and put in QC results into the computer—**HMX,UA,CHEM,COAG** (sun and mon)

Begin Morning Draws and Glucometer sticks

* Replace sheets at end of month and highlight weekly maintenance in Coag and UA Book

*wipe counters

refill-stock phlebotomy trays and work stations

DATA ENTRY INTO COMPUTER

HOW TO RECEIVE ORDERS

go to pending lists
high light patient
modify options
click on receive /collect specimen orders

Exhibit A4

HOW TO ORDER TESTS

enter account # ex: #100045-----
order entry laboratory
choose tests
collect date/time
recv date/time
verify w/ labels

*if phlebotomy not done here, then put
"." and tech initials and date/time
specimen collected

HOW TO INPUT RESULTS AFTER DOING A TEST

click on order entry
go to worksheet screen
ex: MONO- lot#
exp date
Pos- Line
Neg- Clear background
Pt results

HOW TO INPUT DIFFERENT RESULTS FROM SAME TEST

ex: Hema--department specific
click laboratory
CBC of patient
"for indication" of diff
#2, enter
"enter" diff results
click enter
RED cell review
"normal " or "abnormal"
#2
enter results
Complete

ANOTHER WAY:

pt # ex: 1004-----
ALL orders
laboratory
click on unverifies

DATA ENTRY INTO COMPUTER

CHEM

F3 load list

then exit

Put QC results in EXL Maintenance Book, read off of slip, the things to put into book are at top that match the CHEM PRINT OUT, just follow the print out and compare to top of page in book

TEMP:

the laboratory temperature book has the number of the thermometer to read, and the number is listed on the thermometer too.

INPUT chem QC

*short limited cups in blk/brwn rack

on computer attached paper

*MAS QC (all QC is listed on the computer paper slip w/ # to put into the computer)

*CARDIAC QC, HGB A1C QC

ex: QC1: 9119071

QC3: 9119073

P9 will get all tests for 'MAS QC'

F1 , enter data

position, ex: N1

sample #, ex: Hgb A1c QC

QC1 9933921

enter, enter

HB!C (alt + HB!C)

F7, mode, limited cup no level sense

F4, priority

F8, Fluid (QC1)

F3, load list

exit

F4, run, (or green button)

(ALT + hot keys)

When QC is out , hit edit run

process single

run

Hematology @4am do: Abnormal 1 and Normal

F2, esc

diuter function

start-up ,2x

Exhibit A5

DATA ENTRY INTO COMPUTER

Chemistry:

system prep
system counter
change diaphragms
save info
Load film F1
Tension F2
Calibrations print out folder is on top of fridge

TUBE RACK:

regular barcoded tubes in blk /green holders
short specimen cup in tube : orange/yellow w/ green holder

QC and Calibrators use short cup curvette:

blk w/brown holders; just put them in and change computer to QC "limited cup"

LOAD AND RUN SAMPLES:

place in blk/green rack
hit "run" (green button)
F1, to get to manual input screen
keep doing "sample status"/F5 until see time tests have left

LOAD AND RUN QC

manual input 'short sample/limited cup'

Glucometer

after stick then remember to collect and receive the specimen result
before inputting results and completing

MILIPORE

daily maintenance: press arrow once to 'wake up' then
hold down until says "DI", push the check, then the arrow
to move through to D1, D2, D3, D4, D5, D6, then push the menu
button for the main screen

BINDERS

Glucometer QC

Temps

Gather all results, slips put in folder

Gather all tubes, put in fridge and dump the 'next day'

Set out urine QC to get room temp/not really necessary

URINE QC

qc test due

qc strip test

in computer:

Dept specific

QC data management reports

By control

"UR", then chose UR1 or UR2

enter, enter, RDJ (all caps)

put in results

POST

Exhibit A6

Exhibit B

